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Courtney Imrie

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

COURTNEY IMRIE,

Plaintiff,

vs.

HACHIMAN, LLC, a domestic limited
liability company; and, PALOMINO CLUB, a
domestic limited liability company,

Defendants.

Case No.: 2:19-cv-01556-GMN-BNW

**JOINT STIPULATION AND REQUEST TO
STAY PROCEEDINGS PENDING
RESOLUTION**

(First Request)

Pursuant to Local Rules IA 6-1, 6-2, and LR 7-1, Plaintiff Courtney Imrie (“Plaintiff”) and Defendants Hachiman, LLC and Palomino Club, LLC (collectively the “Defendants”), by and through their respective counsel of record, hereby stipulate and request that this Court stay the above-captioned case for one-hundred eighty days (180) days, up to and including June 16, 2021. This Request for a stay is not sought for any improper purpose or other purpose of delay. Rather, it is sought only to conserve the parties’ and court’s respective resources while the parties work on completing a structured settlement. In support of this Stipulation and Request, the parties state as follows:

1 1. Pursuant to the Stipulated Discovery Plan and Scheduling Order approved by the
2 Court on October 19, 2020, and the parties' fourth request for an extension of discovery and related
3 deadlines, approved by the Court on October 20, 2020 the current deadline for completion of
4 discovery in this case is January 11, 2021. **ECF No. 28.**

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6 2. In the fourth request for an extension of the discovery period, the parties informed the
7 Court they were working on resolving this matter before investing additional resources in taking
8 depositions and summary judgment practice . **Id.** Since that time, the parties have worked amicably,
9 diligently, and creatively to achieve a resolution acceptable to each.

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11 3. On December 17, 2020, the parties reached a settlement in theory and are moving
12 forward with drafting the settlement agreement. The settlement is structured and the parties
13 anticipate that it will take approximately six-months to complete.¹

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1 If the Court requests further information regarding the parties' settlement efforts, the parties are willing to file a
28 confidential supplement for *in camera* review.

WHEREFORE, the parties respectfully request that this Court stay this matter for one-hundred eighty days (180) days, up to and including June 16, 2021.

DATED this 18th day of December 2020.

Respectfully submitted,

KEMP AND KEMP

KAMER ZUCKER ABBOTT

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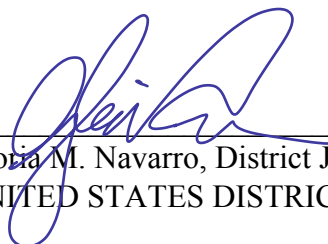
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Courtney Imrie

Attorneys for Defendants
Hachiman, LLC and
Palomino Club, LLC

IT IS SO ORDERED.

Dated this 11 day of January, 2021.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

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